Abramson & Morak 75 Maiden Lane, Suite 607 New York, NY 10038 T: 212-226-7098

May 27, 2022

The Honorable Eric N. Vitaliano
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Re: <u>United States. v. Carlos Espinosa Barba (ENV)</u>
CR. NO. 1:21-cr-00259-ENV-1

Dear Judge Vitaliano:

My client Carlos Espinosa Barba was released on a \$150,000 bond secured by a Confession of Judgement, pre-trial reporting as directed, the surrender of his passport, and his travel restricted to the Eastern and Southern Districts of New York, the District of Columbia and the Southern District of Texas where he resides.

Mr. Barba is seeking permission to travel from the Southern District of Texas, Harris County, Texas, to Omaha, Nebraska for a business trip regarding a promotion. Specifically, Mr. Barba is requesting to travel on June 5, 2022, and returning on June 7, 2022. While on this trip Mr. Barba will be staying at a hotel in South Sioux City, Nebraska.

My co-counsel, Johnny Papantonakis, has informed me that has communicated this travel request to AUSA Derek Ettinger. The Government, through AUSA Ettinger is unopposed to the defendant's request to travel. Mr. Papantonakis has also communicated this request to U.S. Probation Officer, Pat Brewster, who is supervising Mr. Barba while on release. Officer Brewster stated that he is unopposed to this request.

We therefore respectfully request the Court to grant Mr. Barba's request to travel to Omaha, Nebraska from June 5, 2022 through June 7, 2022 for business.

Respectfully submitted,

Alan M. Abramson

## /s/Eric N. Vitaliano

So Ordered:

The Honorable Eric N. Vitaliano

cc.: AUSA Derek Ettinger (via ECF)

Rob Cantu (co-counsel, via email)

Johnny Papantonakis (co-counsel, via email) Probation Officer Pat Brewster (via email)